

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)
)
v.) **Case No.: 2:05-cr-214-T**
)
SANDRA G. DIXON)

UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

COMES NOW the Defendant, **SANDRA G. DIXON**, through undersigned counsel, Donnie W. Bethel, and moves this Honorable Court to continue for at least 60 days the sentencing hearing now scheduled for February 27th, 2006. In support of this motion, the Defendant would show the following:

1. On December 6, 2005, the Defendant pled guilty, pursuant to a plea agreement entered into between the Defendant and the United States. The plea agreement included a cooperation agreement that requires the Defendant to cooperate fully with government agents.

Pursuant to that cooperation agreement government agents have already debriefed the Defendant.

2. The cooperation agreement further obligates the Defendant to testify truthfully before the grand jury, at trial or whenever called upon to do so, including testifying against any codefendant.

3. As part of the plea agreement the United States did not specify that the Defendant was entitled to any particular downward departure at sentencing, but instead agreed that the Defendant may be entitled to a future downward departure under Rule 35 of the Federal Rules of Criminal Procedure.

4. The Defendant requests a postponement of her sentencing hearing so that this Honorable will sentence the Defendant after she has had an opportunity to testify before either the

grand jury that will convene at the end of February or the grand jury that will convene at the beginning of April.

5. The United States, through Assistant United States Attorney Susan Redmond, does not oppose this motion.

WHEREFORE, the Defendant, respectfully requests that this Honorable Court grant her motion to continue her sentencing hearing.

Dated this 8th day of February, 2006.

Respectfully submitted,

s/ Donnie W. Bethel
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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2006, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Susan R. Redmond, Esq.
Assistant United States Attorney
One Court Square, Suite 201
Montgomery, Alabama 36104

Respectfully submitted,

s/ Donnie W. Bethel
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